

ARIANE ROWLAND, and JAMIE SCHULZE,  
Plaintiffs,  
vs.  
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., and WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA  
Defendants.

I, MARVIN GENE SMALLEY, submit the following declaration on behalf of Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) in opposition to the Motion to Compel depositions:

1. I am one of Jehovah’s Witnesses and a member of the Worldwide Order of Special Full-Time Servants of Jehovah’s Witnesses (“Order”).

2. I have personal and direct knowledge of the matters set forth herein.

3. The Order is a group of individuals with no legal form who dedicate their entire lives to supporting the efforts of Jehovah’s Witnesses to spread the gospel about the Christ. All members of the Order operate under a vow of obedience and poverty.

4. As a member of the Order, my daily responsibilities include supporting the religion’s efforts to produce Bible-based religious literature. Since I am 82 years old, I no longer care for as much responsibility as I did in the past.

5. Though I have proofread materials involving child abuse and Jehovah’s Witnesses, I have never been responsible for drafting or writing those materials.

6. I am a voting member of WTNY and co-defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) and have been for decades, but I do not recall when my memberships began.

7. During the entire time of my membership with WTNY and WTPA, I have never cared for, corresponded, or communicated with congregations in Montana.

8. During the entire time of my membership, I was neither a board member nor executive officer of either WTNY or co-defendant WTPA.

9. As best as I can recollect over my life, I have never met nor do I know the plaintiffs in this lawsuit or any of the accused in this lawsuit.


10. I have never attended religious services at any meeting place of Jehovah's Witnesses in Hardin, Montana.

11. I have briefly reviewed the allegations in the operative Complaint and I have no personal, direct, or indirect knowledge about any of the abuse allegations other than what was learned from reviewing that Complaint.

12. While I am acquainted with the beliefs and practices of Jehovah's Witnesses, other members of the religious Order are younger and far more conversant in child abuse matters.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of October, 2022.

  
MARVIN GENE SMALLEY